

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

IVETTE M. MARTÍNEZ GONZÁLEZ, ET  
ALS.,

Plaintiffs

v.

CATHOLIC SCHOOLS OF THE  
ARCHDIOCESES OF SAN JUAN THE  
PROVISIONS OF PENSIONS PLAN, et als.

Defendants

CIVIL No. 16-2077 (GAG)  
16-2318

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NORMA CARDOZA-ESTREMER, ET AL.,  
Plaintiffs,

v.

COLEGIO PADRE BERRIOS, ET AL.,  
Defendants

URGENT MOTION REQUESTING ORDER

TO THE HONORABLE COURT:

COME NOW Defendants Superintendence of the Catholic Schools of the Archdioceses of San Juan (hereinafter “the Superintendence”) and Samuel Soto, through counsel and respectfully **STATE** and **PRAY** as follows:

1. On December 13, 2017, the undersigned counsel filed a Notice of Appearance on behalf of the Superintendence. See Docket No. 163. Also, Defendants requested a stay of all pending deadlines for a period of twenty (20) days to adequately

review the file and file any corresponding motions. See Docket No. 163. Said stay was granted by the Court. See Docket No. 164.

2. On December 21, 2017, Defendants' prior counsel filed a Motion to Withdraw. See Docket No. 173.

3. However, the undersigned counsel has not received the files of both cases from Defendants' prior counsel. As such, Defendants request that the Court order Defendants' prior counsel to deliver the files by the end of business today.

4. Also, Defendants request a period of twenty (20) days after the files have been delivered to the office of Schuster & Aguiló, LLC, to file any pending motions or respond and reply to the motions filed by the other parties.

5. The undersigned counsel informs the Court that he made several attempts to obtain the files prior to filing the instant motion.

WHEREFORE, Defendants respectfully request that the Court take notice of the above mentioned information, order Defendants' prior counsel to deliver the files by the end of business today and grant a period of twenty (20) days after the files have been delivered to the office of Schuster & Aguiló, LLC, to file any pending motions or respond and reply to the motions filed by the other parties.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 22nd day of December 2017.

**WE HEREBY CERTIFY** that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

**SCHUSTER AGUILÓ LLC**

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s/Pedro A. Busó García

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